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 10 Backman, James Rothenburg, James Bertuccini and Melanie O'Daniel

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 LATIA ALEXANDER, individually as heir
 10 of ISAIAH T. WILLIAMS, and in her
 11 capacity as Special Administrator of the
 12 Estate of ISAIAH T. WILLIAMS,

13 Plaintiff,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
 16 DEPARTMENT, a political subdivision of
 17 the State of Nevada; KERRY KUBLA, in his
 18 individual capacity; BRICE CLEMENTS, in
 19 his individual capacity; ALEX GONZALES,
 20 in his individual capacity; RUSSELL
 21 BACKMAN, in his individual capacity;
 22 JAMES ROTHENBURG, in his individual
 23 capacity; JAMES BERTUCCINI, in his
 24 individual capacity; MELANIE O'DANIEL,
 25 in her individual capacity and DOES I-XX,
 26 inclusive,

27 Defendants.

28 Case Number:
 2:24-cv-00074-APG-NJK

**STIPULATION AND ORDER TO
 EXTEND DISPOSITIVE MOTION
 DEADLINE (SECOND REQUEST)**

MARQUIS AURBACH
 10001 Park Run Drive
 Las Vegas, Nevada 89145
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1 Defendants Las Vegas Metropolitan Police Department (“LVMPD”), Kerry Kubla,
2 Brice Clements, Alex Gonzales, Russell Backman, James Rothenburg, James Bertuccini and
3 Melanie O’Daniel (“LVMPD Defendants”), by and through their counsel, Marquis Aurbach,
4 and Plaintiff Latia Alexander, individually as heir of Isaiah T. Williams, and in her capacity
5 as Special Administrator of the Estate of Isaiah T. Williams (“Plaintiff”), by and through her
6 counsel of record, Breeden & Associates, PLLC, hereby agree and jointly stipulate the
7 following:

8 1. The deadline for filing dispositive motions is **April 11, 2025**. (ECF No. 40.)
9 2. The parties are waiting for the deposition transcript of LVMPD’s Rule
10 30(b)(6) witnesses that is critical to the parties’ claims and defenses.

11 3. Defense counsel is out of the office April 8 and 9, 2025 for oral argument at
12 the Ninth Circuit Court of Appeals in the case of *Browning v. Las Vegas Metro Police*
13 *Dep’t.*, Case No. 24-2034.

14 4. Therefore, the parties request a 21-day extension to file dispositive motions
15 until **May 2, 2025**.

16 5. This request for an extension of time is not sought for an improper purpose or
17 other purpose of delay. The parties are requesting a 21-day extension because they agree the
18 outstanding deposition transcript is important for summary judgment purposes and defense
19 counsel will not have adequate time to incorporate it into defendants’ dispositive motion due
20 to the scheduled oral argument.

21 6. WHEREFORE, the parties respectfully request the dispositive motion
22 deadline be extended to and including **May 2, 2025**.

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1 7. This Stipulation is being entered in good faith and not for purposes of delay.

2 IT IS SO STIPULATED this 3rd day of April, 2025.

3 MARQUIS AURBACH

4 BREEDEN & ASSOCIATES, PLLC

5 By: *s/Craig R. Anderson*

6 Craig R. Anderson, Esq.
7 Nevada Bar No. 6882
8 10001 Park Run Drive
9 Las Vegas, Nevada 89145
10 Attorney for Defendants

11 By: */s/ Adam Breedon*

12 Adam Breedon, Esq.
13 Nevada Bar No. 8768
14 7432 W. Sahara Ave, Ste 101
15 Las Vegas, Nevada 89117
16 Attorney for Plaintiff

17 MURPHY'S LAW

18 By: *s/Corrine P. Murphy*

19 Corrine P. Murphy, Esq.
20 Nevada Bar No. 10410
21 2620 Regatta Dr., Ste. 102
22 Las Vegas, Nevada 89128
23 Attorney for Plaintiff

24 **ORDER**

25 The above Stipulation is hereby GRANTED

26 IT IS SO ORDERED.

27

28 UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH
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